

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE**

IN RE:

Marquita Lafaye Bradshaw

Chapter 13 Case

19-28907

Debtor(s)

**EMERGENCY VERIFIED MOTION OF DEBTOR(S) TO IMPOSE AUTOMATIC STAY
UNDER SECTION 362(c)(3) AS TO ALL CREDITORS**

Comes now the Chapter 13 Debtor, by and through counsel, and requests a hearing on November 12, 2019 due to a scheduled foreclosure sale, and represents(s) to the Court as follows:

1. That the Debtor has had two or more prior pending cases dismissed within the last year. Debtor's case number 19-22153, filed 3/13/2019 was dismissed on 8/27/2019. Debtor's case number 18-21643, filed 2/26/2018 was dismissed on 1/28/2019.
2. That the financial affairs of the Debtor have substantially changed since the dismissal of the prior cases and the Debtor feels that she can fund and fully perform their plan because debtor's income is regular and consistent. Debtor was receiving only unemployment compensation during her prior case. Debtor now has regular full time employment, is able to make timely payments, and set up a payroll deduction.
3. That Paragraph 23 of Schedule J accompanying the Chapter 13 petition signed by the Debtor provides total projected monthly income of \$1,933.59 and total projected monthly expenses of \$1,835 with a monthly net income of \$1,098.59
4. That the proposed plan payment is \$1,087.67 per month.
5. That the Debtor's prior Chapter 13 cases were not dismissed because the Debtor's failed to provide adequate protection ordered by the Court or after the Debtor's failed to file or amend the petition or other documents as required by the Bankruptcy Code or the Court without substantial excuse.
6. That the Debtor's prior Chapter 13 cases were not dismissed while an action under Section 362(d) of the Bankruptcy Code was pending or after such an action had been resolved with an order terminating, conditioning or limiting the stay.
7. That this petition has been filed in good faith as to the creditors to be stayed and the Debtor believes she can fully perform the terms of the proposed plan should it be confirmed by this Honorable Court.

WHEREFORE, PREMISES CONSIDERED, your Debtor would request a hearing on the next available hearing date, Tuesday, November 12, 2019 due to a pending foreclosure on November 14, 2019 and moves this Court under Section 362(c)(4) to impose the automatic stay under Section 362(a) as to all creditors for the duration of this Chapter 13 case or until such time as the stay is terminated, modified, or annulled under Section 362(d) of the Bankruptcy Code or further order of the Court.

/s/ Arthur A. Byrd Jr.

Arthur A. Byrd Jr. (029081)
Attorney for the Plaintiff/Debtor
116 Mulberry Street East
Collierville, TN 38017
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aabyrdjr@gmail.com

/s/Marquita Lafaye Bradshaw

Marquita Lafaye Bradshaw

Debtor

Date: 11/7/19

CERTIFICATE OF SERVICE

I hereby certify that on November 7, 2019, a copy of this document was sent to the following by first class US Mail.

/s/ Arthur A. Byrd Jr.

Arthur A. Byrd Jr.
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Debtor

Chapter 13 Trustee

All entities on matrix